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CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DENNIE A. ROWLAND,
CANDI A. WEBB,
RICHARD L. OVERDORF,

Defendants.

) INDICTMENT

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CASE NO. _____

Title 21, Sections 841(a)(1),
(b)(1)(C), 843(a)(3), (d)(1), and
846, United States Code

JUDGE PEARSON

5:18 CR 79

COUNT 1

(Conspiracy to Possess with the Intent to Distribute and to Distribute Controlled Substances, 21 U.S.C. § 841(a)(1) and (b)(1)(C), and to Acquire and Obtain Controlled Substances by Forgery, 21 U.S.C. §§ 843(a)(3) and (d)(1), in violation of 21 U.S.C. § 846)

The Grand Jury charges:

1. From on or about December 9, 2015, and continuing to on or about November 28, 2016, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants DENNIE A. ROWLAND, CANDI A. WEBB, and RICHARD L. OVERDORF, did knowingly and intentionally combine, conspire, confederate, and agree together and with each other, and with others known and unknown to the Grand Jury, to possess with the intent to distribute and to distribute a mixture and substance containing a detectable amount of Oxycodone, a Schedule II controlled substance, and Amphetamine Salts, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) and to acquire and obtain controlled substances, including Oxycodone, a Schedule II controlled substance, Amphetamine

Salts, a Schedule II controlled substance, and Alprazolam, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 843(a)(3) and (d)(1).

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that:

a. ROWLAND and WEBB worked in a doctor's office ("the Doctor's Office") in the Northern District of Ohio, Eastern Division.

b. The doctor's office where ROWLAND and WEBB worked also employed a doctor ("the Doctor") and a nurse practitioner ("the Nurse Practitioner") who were legally authorized to write prescriptions for controlled substances.

c. The Doctor and the Nurse Practitioner only wrote prescriptions for patients of the Doctor's Office.

d. ROWLAND and WEBB, who were not legally able to write prescriptions, took control of prescription pads.

e. ROWLAND and WEBB, using those prescription pads, wrote unauthorized prescriptions for controlled substances in the names of family, friends, acquaintances, and others, who often times did not know about the use of their name.

f. ROWLAND and WEBB forged the Doctor and Nurse Practitioner's signatures on the unauthorized prescriptions.

g. ROWLAND, WEBB, OVERDORF, and others presented, or caused others to present, those unauthorized prescriptions to pharmacies, which provided the prescribed controlled substances.

h. ROWLAND, WEBB, OVERDORF, and others then used the controlled substances themselves and distributed the controlled substances.

ACTS IN FURTHERANCE OF THE CONSPIRACY

3. In furtherance of the conspiracy, and to effect the goals and conceal the existence thereof, Defendants and others performed acts in the Northern District of Ohio and elsewhere, including, but not limited to, the following:

a. On or about June 30, 2016, WEBB forged the Doctor's signature on a prescription for 90 pills of Oxycodone, 10/325 milligrams, a Schedule II controlled substance, in the name of an individual (False Patient #1).

b. On or about August 30, 2016, WEBB forged the Doctor's signature on a prescription for 90 pills of Oxycodone, 7.5/325 milligrams, a Schedule II controlled substance, in the name of an individual (False Patient #2).

c. On or about September 6, 2016, WEBB forged the Doctor's signature on a prescription for 120 pills of Oxycodone, 10/325 milligrams, a Schedule II controlled substance, in the name of OVERDORF.

d. On or about September 9, 2016, OVERDORF, who was then not a patient of the Doctor, picked up a prescription in his name for 120 pills of Oxycodone, 10/325 milligrams, a Schedule II controlled substance, from the pharmacy at the Akron Pharmacy store located at 879 East Exchange Street, Akron, Ohio.

e. On or about September 23, 2016, ROWLAND forged the Nurse Practitioner's signature on a prescription for 60 pills of Amphetamine Salts, 30 milligrams, a Schedule II controlled substance, and a prescription for 90 pills of Alprazolam, 1 milligram, a Schedule IV controlled substance, in the name of an individual (False Patient #3).

f. On or about September 24, 2016, ROWLAND picked up a prescription that had been in the name of False Patient #3 for 60 pills of Amphetamine Salts, 30 milligrams, a

Schedule II controlled substance, and a prescription that had been in the name of False Patient #3 for 90 pills of Alprazolam, 1 milligram, a Schedule IV controlled substance, from the pharmacy at the Giant Eagle store located at 2801 East Waterloo Road, Akron, Ohio.

g. On or about October 3, 2016, WEBB forged the Doctor's signature on a prescription for 120 pills of Oxycodone, 10/325 milligrams, a Schedule II controlled substance, in the name of an individual (False Patient #4).

h. On or about October 4, 2016, OVERDORF distributed several of the Oxycodone, 10/325 milligram pills that had been prescribed, via forgery, to False Patient #4, as detailed in paragraph 3.g of this Indictment.

i. On or about October 10, 2016, ROWLAND picked up a prescription that had been in the name of an individual (False Patient #5) for 90 pills of Alprazolam, 1 milligram, a Schedule IV controlled substance, from the pharmacy at the Discount Drug Mart store located at 711 Canton Road, Akron, Ohio.

j. On or about October 14, 2016, WEBB forged the Doctor's signature on a prescription for 120 pills of Oxycodone, 10/325 milligrams, a Schedule II controlled substance, in the name of OVERDORF.

k. On or about October 14, 2016, OVERDORF, who was then not a patient of the Doctor, picked up a prescription in his name for 120 pills of Oxycodone, 10/325 milligrams, a Schedule II controlled substance, from the pharmacy at the Akron Pharmacy store located at 879 East Exchange Street, Akron, Ohio.

l. On or about October 22, 2016, ROWLAND picked up a prescription that had been in the name of an individual (False Patient #6) for 120 pills of Oxycodone, 10/325 milligrams, a Schedule II controlled substance, and a prescription that had been in the name of

False Patient #6 for 90 pills of Alprazolam, 1 milligram, a Schedule IV controlled substance, from the pharmacy at the Giant Eagle store located at 907 West Maple Street, Hartville, Ohio.

m. On or about November 1, 2016, WEBB forged the Doctor's signature on a prescription for 120 pills of Oxycodone, 15 milligrams, a Schedule II controlled substance, in the name of False Patient #4.

n. On or about November 3, 2016, OVERDORF distributed several of the Oxycodone, 15 milligrams pills that had been prescribed, via forgery, to False Patient #4, as detailed in paragraph 3.m of this Indictment.

o. On or about November 7, 2016, WEBB forged the Doctor's signature on a prescription for 90 pills of Oxycodone, 7.5/325 milligrams, a Schedule II controlled substance, in the name of an individual (False Patient #7).

p. On or about November 10, 2016, WEBB forged the Doctor's signature on a prescription for 120 pills of Oxycodone, 10/325 milligrams, a Schedule II controlled substance, in the name of OVERDORF.

q. On or about November 11, 2016, OVERDORF, who was then not a patient of the Doctor, picked up a prescription in his name for 120 pills of Oxycodone, 10/325 milligrams, a Schedule II controlled substance, from the pharmacy at the Akron Pharmacy store located at 879 East Exchange Street, Akron, Ohio.

r. On or about November 11, 2016, ROWLAND picked up a prescription that had been in the name of an individual (False Patient #8) for 120 pills of Oxycodone, 10/325 milligrams, a Schedule II controlled substance, from the pharmacy at the Walmart store located at 4572 Mega Street NW, North Canton, Ohio.

s. On or about November 16, 2016, ROWLAND picked up a prescription that had been in the name of False Patient #5 for 90 pills of Oxycodone, 10/325 milligrams, a Schedule II controlled substance, from the pharmacy at the Discount Drug Mart store located at 711 Canton Road, Akron, Ohio.

t. On or about November 18, 2016, ROWLAND picked up a prescription that had been in the name of False Patient #3 for 120 pills of Oxycodone, 10/325 milligrams, a Schedule II controlled substance, and a prescription that had been in the name of False Patient #3 for 60 pills of Amphetamine Salts, 30 milligrams, a Schedule II controlled substance, from the pharmacy at the Giant Eagle store located at 2801 East Waterloo Road, Akron, Ohio.

All in violation of Title 21, United States Code, Section 846.

FORFEITURE

The Grand Jury further charges:

4. For the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853, the allegations of Count 1 are incorporated herein by reference. As a result of the foregoing offenses, Defendants DENNIE A. ROWLAND, CANDI A. WEBB, and RICHARD L. OVERDORF, shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of such violations; any and all of their property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Court, pursuant to the E-Government Act of 2002.